

**South East & London Area Office**

Bucks Horn Oak  
Farnham  
Surrey  
GU10 4LS

[planningconsultationSEL@forestrycommission.gov.uk](mailto:planningconsultationSEL@forestrycommission.gov.uk)

**Area Director**

Jane Hull

Dear Inspector,

**As a Non-Ministerial Government Department, we do not provide an opinion supporting or objecting to planning applications.** Instead, we provide advice on the potential impact that proposed developments could have on trees and woodland using our local knowledge and expertise, planning policy and legislation that could be relevant and measures that could help to avoid or limit impacts and result in overall gains wherever possible.

For our full position and advice regarding this Project, please refer to our Statement of Common Ground which the Applicant will be submitting by Deadline 9, which should be in conjunction with this submission. We would like to make it clear that while we have not been able to agree all matters with the Applicant, we are of the view that they have engaged and consulted us in a positive and effective way.

We feel it is important to highlight some points that we advise the Inspector consider in their decision making as they relate to matters that we were unable to agree with the applicant, in the interest of working towards the least harmful impacts and mitigation/compensation measures that are effective and suitable for the scale of loss and impacts that will be caused by this project including on irreplaceable Ancient Woodland habitat.

**Enhancement of Ancient Woodland condition as part of compensation measures**

Forestry Commission is strongly opposed to any loss of ancient woodland and therefore does not agree with the loss of ancient woodland resulting from the Project. (see Matter 2.1.1). However, we have engaged with the Applicant to positively seek suitable compensation for ancient woodland loss as far as possible given that it is irreplaceable. We welcome the compensation measures that the Applicant is proposing including those that have been made in response to our concerns. However, we have requested that compensation measures should go further, particularly related to the loss and impacts of Claylane Woods that would result from utilities routes being proposed. The Applicant has engaged with us to explain the logistical/safety restrictions regarding less harmful methods that we have asked for (trenchless) and to minimise impacts. However, it is our view that given the residual impacts, the compensation measures should be improved to commit to enhancing woodland condition for the remaining part of Claylane Woods within the Order Limit boundary (approximately 5 Hectares). Currently, it is our understanding that the Applicant is only committing to maintaining its existing condition.

Although the compensation measures including planting and careful translocation of ancient soils is welcome, enhancing the condition of Claylane Woods could help to maximise the value of the irreplaceable ancient woodland that remains. We would also welcome and encourage the enhancement of any and all woodland within the project's order limits, with ancient woodland being the main priority. In our view, this would go a significant way towards compensating for the direct and permanent loss of irreplaceable ancient woodland that would result from this project.

### **Management in line with UK Forestry Standard**

We have made recommendations to the Applicant to incorporate in the project's detailed design (Matter 2.1.16, Appendix C of our SoCG) and we are pleased that the Applicant has agreed to 'take full consideration of the Forestry Commission's advice (see Appendix C) and implement this as far as reasonably practicable to ensure the successful delivery of the commitments and requirements of the DCO application'. As part of this, we have advised that woodland management (of existing and woodland to be created) should be managed in accordance with the UK Forestry Standard (UKFS) - <https://www.gov.uk/government/publications/the-uk-forestry-standard>. We have requested for this to be made as a firm commitment as we advise it is fundamental to providing an established industry standard that provides a level of measurability for ensuring all woodland is managed effectively and sustainably. However, we understand from the Applicant that at this stage in the Examination (after Deadline 8), it has not been possible to secure additional compensation measures to meet our request.

### **Higher standards for Green Bridges**

We welcome the commitment to the 7 new green bridges as part of the proposals. We also welcome the reference to the Natural England Literature Review (2015) and Landscape Institute Guidance based on this literature review (2016). However, we advise that the wording should be stronger to ensure high standards of green bridges are delivered. An important part of the landscape and ecological compensation measures is reliant on the green bridges being effective at providing strategically placed routes of connectivity. And given the nature of the project and its prominence of the area's landscape and ecological value, we would expect these to be exemplars that provide a lasting positive legacy.

We advise that effective connectivity is particularly important considering the direct loss/impacts to ancient woodland sites and considering that the Gravesend airfield to the North of Claylane Wood is not being proposed for woodland creation as requested (Matter 2.1.7), which will limit the level of connectivity between Claylane Wood and other woodland areas, and the severance of green space that will be replaced with the road proposal to the East of Claylane Wood. We appreciate the detail of the design will be confirmed later in the process and welcome our involvement as part of this. However, we request that the Applicant commits to following the guidance outlined in the aforementioned guidance and delivers these in line with advisory group recommendations to ensure these are of an acceptable standard, in addition to any other measures or conditions that will improve the quality of the green bridges from an ecological and landscape perspective. The Forestry Commission appreciates that the Applicant has engaged with us positively and effectively throughout the Examination period. We understand from the Applicant that at this stage in the Examination (after Deadline 8), it has not been possible to secure changes to meet our request which, in our view, is needed to ensure adequate levels of connectivity once established

### **Conditions**

If the Inspector is minded to consent this Project, we encourage for the above to set as conditions which we advise should be considered as part of the Project's mitigation and

compensation measures. We remain committed to working with the Inspector and the Applicant to help design and set effective mitigation and compensation measures.

Kind regards,

Richard Cobb  
Local Partnership Advisor  
Forestry Commission - South East and London Area